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US DISTRICT COURT E.D.N.Y.
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★ SEP 12, 2016 ★
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Rec'd 9/14/16 (8)

Pg 5

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
---X

Paul Walton

Plaintiff,

-against-

Katie Ringer, Esq, et al.

Defendants.
---X

AMENDED COMPLAINT

1: 16 CV 01989 (ENV) (LB)

The plaintiff/petitioner Paul Walton being duly sworn, affirms & declares under penalty of perjury, & states that I requested to be allowed to amend my federal lawsuit because I'd like to strengthen it be clarifying those to whom I am suing in both their individual & official capacities, & to broaden or increase & jointly correct those to whom I am in fact suing. I'd like to now state that I am suing for: Ⓐ libel, Ⓑ slander, Ⓒ defamation of character, Ⓓ ineffective counsel, Ⓔ conspiracy, Ⓕ failure to protective, Ⓖ excessive use of force, Ⓗ assault & battery, Ⓘ negligence, & Ⓙ wrongful arrest & Ⓚ wrongful imprisonment, & Ⓛ unlawful & wrongful detention, Ⓜ fraud, [redacted] Ⓝ violating my constitutional rights to testify before the grand jury when I requested this & desired such & Ⓞ violating my rights to due process when I wanted also a special trial but my atty stated I was refusing my 30.30 rights to such. I must state that I also am suing for Ⓟ emotional distress Ⓠ mental anguish & Ⓡ pain & suffering Ⓢ medical malpractice. This all begin with defendant Thomas Smith of St. John's Episopal Hospital, & 3 other security guards at this hospital all began to say with this nurse that I had to be admitted there & stay unwillingly after I simply came there to refill my medication of abilify on 1/21/15. When I being upset about this began to refuse & complain this security

named Thomas Smith along with the other 3 Security guards assaulted & battered me
Pg 6 & roughed me up and all began holding me down stating I was going to be given an unnecessary shot for behaving uncompliant. As they all while using excessive force manhandled me this male nurse pulled down my pants & wrongfully & against my will gave me a shot in the butt as Thomas Smith this security guard who kept painfully holding me down lyingly screamed out as absolutely clear slander that I'd bit him & that he'd heard me say I've got the H.I.V. sickness.

He being the great thespian/actor that he was comparable to Sidney Portier along with his fellow phony security guards who were all on the hospital's cameras when this happened conspired to have me wrongfully arrested, & to have the cameras eventually deleted with their fellow corrupt security guards. As a result of this I was wrongfully imprisoned after I got wrongfully arrested with false charges of 2nd & 3rd degree assault, attempted assault, & 2 degree harassment. Since then I have been not only unlawfully detained at Rikers Island in the A.M.K.C. C95 Bldg, but for close to 2yrs I have been set up as libel, slander, & defamation of character by these 3 psychiatrists & shipped back & forth to the Mid-Hudson Forensic Psychiatric Center.

These psychiatrists names are Dr. Steven Rubel, Dr. Alan Perry & Dr. Claude (or Claudia) Francois & they & my 1st atty named Katie Ringer all conspired to unlawfully detain me wrongfully by 3 bogus C.P.L. 730.30 exams that were all fraudulent in their conclusions. By these & other things my 1st atty Katie Ringer not only by wrongfully asking for C.P.L. 730 exams against my wishes & real need purposely violated my rights to a speedy trial, but also she lyingly as clear libel & slander stated that I was refusing my right to go in front of the grand jury which could have I feel gotten my case throw out altogether, or knocked down at worse to a misdemeanor of obstruction of administration (See Exhibit A on page 4).

Due all of this nonsense done to me & time taken away from my family who I love, & the outside world I am also suing for emotional distress, mental anguish, & I have truly experience much pain & suffering due to this entire fiasco of not only emotional & mental but physical. As a result of these 3 psychiatrists & Katie Ringer my 1st atty etc., causing me to come to Mid Hudson Forensic Psychiatric Center I have experienced being brutalized & assaulted & battered by the Security

Hospital Treatment Assts named Mr. Plaza, Mr. David [redacted] Vasquez
& Mr. Petty who all gang assaulted me here & viciously slammed my face
P97 into the concrete ground outside in the pouring rain.

I am accusing these 3 psychiatrists & Katie Ringer & these
3 Security Hospital Treatment Assts of all being involved in negligence
in their acts that led to this unnecessary chain of events by me coming
to Mid-Hudson Forensic Psychiatric Center in the 1st place, but also
Katie Ringer's acts of refusing to have me brought in front of the grand
jury is clear failure to protect & the other SHTAs at this hos-
pital here who allowed me to be pummeled are also negligently involved
in failure to protect me as are these actual assaultive SHTAs who are
supposed to ensure my safety, & security here. I am requesting by federal
law due to the directly connected nature of this brutal assault & battery
that left my entire eye swollen on the right to sue them in the U.S.
Eastern District Court on this lawsuit although this hospital is in the
U.S. Southern District not too far from this jurisdiction.

If allowed to do so the persons that I would be suing
are not only the 3 SHTAs shown above, but also I am suing for neg-
ligence & medical malpractice due to this [redacted] Dr. Steven Rubel &
Dr. Alan Perry, & Dr. Claude (or Claudia) Francois who all either wrong-
fully & unnecessarily committed libel, fraud, & slander by claiming that
I needed C.P.L. 730.30 exams in the 1st place & falsely ruled that
I failed these, & could not assist my atty in my own defense.

For all of this I am demanding $15 million, & requesting
that I be given a jury trial, & jointly requesting that the court
allow under federal law for my assailants at Mid-Hudson
Forensic Psychiatric Center in Orange County NYS Southern
federal District to be sued on this lawsuit at this court in
NYS' U.S. Eastern District Court. I request all of these things
& pray for victory in my request for a speedy trial as well that
announce ready to go to trial on now. Thank you & I am also
suing D.A. Richard Brown of Queens
County for conspiracy to have me de-
tained 3 times wrongfully on 3 totally
unnecessary C.P.L. 730.30's & him, and
Katie Ringer for equal protection.

Paul Walton
SIGNATURE

PAUL WALTON
PRINTED NAME

9/6/16
DATED

Exhibit A

CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS : PART______

---x

P98

THE PEOPLE OF THE STATE OF NEW YORK

Waiver of 180.80, 190.80 And 30.30 Rights

-against-

Docket #: 2015QN003877

Walton, Paul

Defendant.

---x

State of New York)
ss.:
County of Queens)

The defendant hereby requests that this case be adjourned to Part AP-6 or Part AP-N, on the 6 day of Feb, 2015, for conference.

The defendant hereby waives any and all constitutional rights to a speedy trial as well as all statutory rights under CPL Sections 180.80, 190.80 and 30.30 until the 20 day of Feb, 2015.

Dated: Jan 23, 2015
Kew Gardens, New York

x______________________________
Defendant

x K. Bunger
Attorney For Defendant

01/05

pg 9

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Paul Walton
Plaintiff,

[Insert full name of plaintiff/prisoner]

-against-

Katie Ringer, Dr. Steven Rubel, M.D.
~~St. John's (Episcopal) Hospital~~
~~David Wicker~~ Dr. Alan Perry Ph.d
Thomas Smith, Dr. Claude (or Claudia)
Francois, SHTA Mr. Plaza, SHTA Mr. David
Vasquez & SHTA Mr. Petty, D.A. Richard Brown
Defendant(s).

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I]

CIVIL RIGHTS COMPLAINT
42 U.S.C. § 1983

JURY DEMAND

YES ✓ NO ____

I. Parties: (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff Paul Walton

If you are incarcerated, provide the name of the facility and address:

Mid Hudson Forensic Psychiatric Center
2834 State Route 17M
New Hampton, N.Y. 10958

Prisoner ID Number: C# 11188

pg 10

If you are not incarcerated, provide your current address:

Paul Walton, 2834 State Route 17M, New Hampton, N.Y.
10958-0158

Telephone Number: #(845) 374-8700 (main # of this psyche hospital)

B. List all defendants. You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1

Dr. Steven Rubel M.D.
Full Name

Psychiatrist
Job Title

Dr. Alan Perry Phd
Psychologist
Address

Defendant No. 2

Dr. Claude (or Claudia) Francois Psy D
Full Name

Psychologist
Job Title

Note: All of the 3 above work regularly at Kings
County Hospital
Address

Defendant No. 3

~~Thomas Smith~~ Mr. David Vasquez
Full Name

Security Hospital ~~Treatment~~ Assistant
Job Title

Mid Hudson Forensic Psychiatric Center

P9 11

2834 State Route 17 M, New Hampton, N.Y. 10958-0158
Address

Defendant No. 4

Mr. Petty & Mr. Plaza
Full Name

Security Hospital Treatment Assistants
Job Title

Mid Hudson Forensic Psychiatric Center, 2834 State Route 17M, New Hampton, N.Y. 10958-0158
Address

Defendant No. 5

Thomas Smith
Full Name

Security Guard
Job Title

St. John's Episcopal Hospital
Beach 19th Street, Far Rockaway, N.Y. 11691
Address

II. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 ½ by 11 sheets of paper as necessary.)

Where did the events giving rise to your claim(s) occur? These events occured at 1st St. John's Episcopal Hospital & the later 2nd at court with my devious 1st assigned atty Katie Ringer wrongfully requesting a C.P.L. 730.30 exam on me etc., & 3rdly at Mid Hudson Forensic Psychiatric Center where I got brutally assaulted by their SHTAs.

When did the events happen? (include approximate time and date) The events at St. John's Episcopal Hospital happened on 1/21/15 at about 8:40 P.M. The situation with my atty happened the next day on 1/22/15 at 10:30 P.M. The events here at Mid-Hudson Forensic Psychiatric Center happened at 5:30 P.M. approximately.

pg 12 Facts: (what happened?) Note: See the amendment to my complaint noted on the 1st 3 pages.

II.A. **Injuries.** If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

My injuries are both mental & psychological from the assault on me at St. John's Hospital with some pain & physical abuse from being punched a bit by the security guards at this hospital & then an assault on me by shooting me up with medication. At Mid-Hudson Forensic Psychiatric Center I got assaulted in December before Christmas & had my face slammed into the concrete ground extremely hard which

Pg 13 caused my face to swell up.

III. Relief: State what relief you are seeking if you prevail on your complaint.

I am seeking & demanding $20 million for all of my physical & emotional & mental pain & suffering from ALL of these events & I would like for the court to order that these staff members lose their jobs at all of these places, & facilities that they all work at. This is only just as far as all that I am demanding to set a precedent for their corrupt conduct & behavior.

I declare under penalty of perjury that on 9/6/16 (date), I delivered this complaint to prison authorities at Mid-Hudson Forensic Psychiatric Center (name of prison) to be mailed to the United States District Court for the Eastern District of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 9/6/16

Paul Walton
Signature of Plaintiff

Mid Hudson Forensic Psychiatric Center
Name of Prison Facility or Address if not incarcerated

2834 State Route 17M
New Hampton, N.Y. 10958-0158

Address

C#11188
Prisoner ID#

rev. 12/1/2015

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

pg 14

Paul Walton
Plaintiff,

-against-

Katie Ringer, Esq.
Defendant.

Affirmation of Service

1:16 cv 01989 (ENV)(LB)

I, Paul Walton, declare under penalty of perjury that I have served a copy of the attached 42 U.S.C. 1983 lawsuit & request for appointment of counsel by the court upon (A) Court Clerk, (C) Katie Ringer Esq., (B) Thomas Smith, (D) Dr. Steven Rubel, M.D., Dr. Alan Perry, Ph.d, Dr. Claude (or Claudia) Francois, (E) SHTAs: David Vasquez, Mr. Plaza & Mr. Petty & (F) D.A. of Queens County Richard A. Brown whose address is: (A) 225 Cadman Plaza East, Brooklyn, N.Y. 11201 (B) St. John's Episopal Hospital 327 Beach 19th St, Far Rockaway, N.Y. 11691, (D) Kings County Hospital Center, 451 Clarkson Ave., Brooklyn, N.Y. 11203 & (C) 89-17 Supthin Blvd., 4th Floor, Jamaica, N.Y. 11435 (E) 1 Civic Center Plaza, Poughkeepsie, N.Y. 12601

Dated: 9/6/16, New York

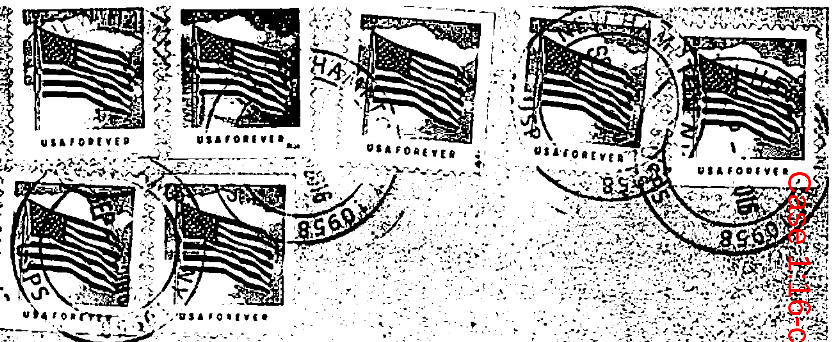
Paul Walton
Signature

Mid-Hudson Forensic Psychiatric Center
Address 2834 State Route 17M

New Hampton, N.Y. 10958-0158
City, State, Zip Code

Note: (A) Above is the address of the U.S. Court Clerk (B) above is the address of security guard Thomas Smith (C) above is the address of NYC Corporation Counsel (D) above is the address of the 3 doctors individually which is though ALL at the same address & (E) above is the address of the NYS Atty General. Note: The address of (F) is the exact same one as (C) & (D) Thank you.

PAUL WALTON, 11188
2834 STATE ROUTE 17M
NEW HAMPTON, N.Y. 10958-0158



U.S. COURT CLERK
U.S. EASTERN DISTRICT COURT
225 CADMAN PLAZA EAST
BROOKLYN, N.Y. 11201

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BROOKLYN OFFICE

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